

EXHIBIT C

AFFIDAVIT OF DR. CARL HOFFMAN

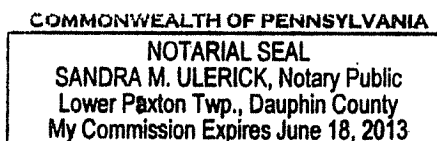
5. Richard C. Smith reported to me. I was his supervisor. No one else at PrimeCare Medical Inc. supervised his job duties.
6. As President of PrimeCare Medical, Inc., I set Mr. Smith's salary and bonuses. In 2006, I paid him a base salary of \$129,562 and bonuses totaling \$14,647.61. In 2007, I paid him a base salary of \$129,624 and the following bonuses: March 16, 2007 - \$20,000; June 28, 2007 - \$12,789.36; December 21, 2007 - \$14,564.14. See Exhibit #1; payroll records.
7. Mr. Smith had no leave time available to him as of May 10, 2007.
8. PrimeCare Medical Inc. paid Mr. Smith his full salary and benefits while he was on a medical leave of absence from May 10, 2007 through January 28, 2008.
9. The first time Dr. Brier notified PrimeCare Medical Inc. that Mr. Smith was cleared to return to work was when Mr. Smith's attorney faxed Dr. Brier's letter of January 17, 2008 to PrimeCare's attorney on January 23, 2008.
10. I never prohibited Mr. Smith from contacting any governmental authority regarding any allegation of waste or wrongdoing; and, it has always been the policy of PrimeCare Medical, Inc. not to prohibit or otherwise discourage any employee from making reports of waste and / or wrong-doing.
11. Mr. Smith signed and approved the psychiatrists' schedule for PA/NH Facilities that included Dauphin County Prison on May 7, 2007, which is attached as Exhibit #2 of this affidavit.

Carl A. Hoffman, Jr., D.O., CCHP
Carl A. Hoffman, Jr., D.O., CCHP

Sworn to and subscribed
before me this 28th day
of August, 2009.

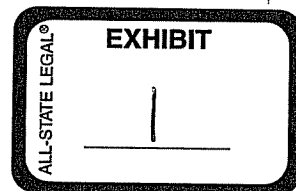
Sandra M. Ulerick
Notary Public

My Commission Expires:



Employee Earnings Report

<u>FILE#</u>	<u>NAME</u>	<u>PAYDATE</u>	<u>GROSS</u>	<u>FEDTAX</u>	<u>SSTAX</u>	<u>MEDTAX</u>	<u>STTAX</u>	<u>Health</u>	<u>401k</u>	<u>Checking</u>	<u>Savings</u>	<u>CompReimb</u>	<u>Misc</u>
1022	Smith, Richard C.	01/06/2006	4,980.76	707.07	308.81	72.22	152.91	0.00	98.85	3,058.91	0.00	50	0
1022	Smith, Richard C.	01/20/2006	4,980.76	707.07	308.8	72.22	152.91	0.00	98.85	2,896.90	0.00	50	0
1022	Smith, Richard C.	02/03/2006	4,980.76	707.07	308.81	72.22	152.91	0.00	98.85	2,896.90	0.00	50	0
1022	Smith, Richard C.	02/17/2006	4,980.76	707.07	308.81	72.22	152.91	0.00	98.85	2,950.14	0.00	50	0
1022	Smith, Richard C.	03/03/2006	4,980.76	707.07	308.81	72.23	152.91	0.00	98.85	2,950.13	0.00	50	0
1022	Smith, Richard C.	03/17/2006	4,980.76	707.07	308.8	72.22	152.91	0.00	98.85	2,950.14	0.00	50	0
1022	Smith, Richard C.	03/31/2006	4,980.77	707.07	308.81	72.22	152.91	0.00	98.85	2,950.15	0.00	50	0
			34,865.33										



FILE	SSN	DATA CONTROL	SEX	CLOCK	EMPLOYEE NAME AND ADDRESS	STATE	SU/SDI	LOCAL
1022	XXX XX 9821		M		SMITH, RICHARD C.	PA	59	110C
Date 1	Date 2	Date 3						
03/30/1990	03/04/1954				366 EQUUS DRIVE			

CAMP HILL, PA 17011																															
PAY DETAILS			HOURS/UNITS		EARNINGS		GROSS		STATUTORY DEDUCTIONS				VOLUNTARY DED		NET PAY																
Pay #	P/E Date	Pay Date	Reg	O/T	Hours 3 & 4	Reg	O/T	Earnings 3 & 4	Earnings 5	Federal State	SS MED	Local Suppl	Amount	CD	Amount	CD	Check #														
01	04/09/2006	04/14/2006	78.00	2.00	L	4856.24		124.52	L	4980.76			707.07	308.81	99.62	4.48	2900.33	X	55.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000150029
02	04/23/2006	04/28/2006	76.00	4.00	L	4731.72		249.04	L	4980.76			707.07	308.80	99.62	4.48	2900.34	X	55.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000170032
03	05/07/2006	05/12/2006	72.00	8.00	L	4482.68		498.08	L	4980.76			707.07	308.81	99.62	4.49	2900.32	X	55.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000190029
04	05/21/2006	05/26/2006	56.00	24.00	L	3486.53		1494.23	L	4980.76			707.07	308.81	99.62	4.48	2888.33	X	67.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000210028
05	06/04/2006	06/09/2006	63.00	17.00	L	3922.35		1058.41	L	4980.76			707.07	308.81	99.62	4.48	2888.33	X	67.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000230025
06	06/18/2006	06/23/2006	78.00	2.00	L	4856.24		124.52	L	4980.76			707.07	308.80	99.62	4.48	2888.34	X	67.75	55	298.85	K	10.40	O	50.00	R	154.96	1	165.36	2	000000250026

TOTALS		REG HOURS	O/T HOURS	HOURS	REG EARNINGS	O/T EARN	EARNINGS 3	EARNINGS 4	EARNINGS 5	GROSS PAY	FEDERAL TAX	STATE TAX	SOC. SEC. TAX	MEDICARE TAX	LOCAL TAX	NET PAY
QTR	423.00	0.00	57.00	0.00	26335.76	0.00	3548.80	0.00	0.00	29884.56	4242.42	917.46	1852.84	433.32	26.89	21813.91
YTD										64749.89	9191.91	1987.83	938.87	58.27	0.00	0.00

HOURS/UNITS ANALYSIS		EARNINGS ANALYSIS		STATE ANALYSIS		LOCAL ANALYSIS	
57.00	L	3548.80	L	917.46	59PA	597.72	110C
						1793.10	K
						992.16	2
						62.40	O
						370.50	55
						17365.99	R
						300.00	X
						929.76	1



Employee Earnings Record

PRIMECARE MEDICAL

Company Code: DMV

Batch: 0063-052 Quarter Ended: 06/30/2006

SMITH, RICHARD C.

Page: 37

FILE	SSN	DATA CONTROL	SEX	CLOCK	EMPLOYEE NAME AND ADDRESS	STATE	SUI/SDI	LOCAL
1022	XXX XX 9521		M		SMITH, RICHARD C.	PA	59	110C
Date 1	Date 2	Date 3						
03/30/1990	08/04/1954							

CAMP HILL, PA 17011

PAY DETAILS				HOURS/UNITS				EARNINGS				GROSS				STATUTORY DEDUCTIONS				VOLUNTARY DED				NET PAY	
Pay #	P/E Date	Pay Date	Rate	Reg	O/T	Hours 3 & 4		Reg	O/T	Earnings 3 & 4	Earnings 5		Federal	State	SS	Med	SUI/SDI	Amount	CD	Amount	CD	Check #			
01	12/31/2006	01/05/2007	62.2595	64.00	16.00	L		3984.61		996.15	L		4980.76		692.13	308.81	99.62	4.48	3035.23	X	75.15	55	0000000010026		
099		62.2595											152.91						298.85	K	26.00	O			
																			50.00	R	165.36	2			
02	01/14/2007	01/19/2007	62.2595	80.00				4980.76					4980.76		692.13	308.80	99.62	4.49	3035.23	X	75.15	55	0000000030026		
099		62.2595											152.91						298.85	K	26.00	O			
																			50.00	R	165.36	2			
03	01/28/2007	02/02/2007	62.2595	72.00	8.00	L		4482.68		498.08	L		4980.76		692.13	308.81	99.62	4.48	2779.24	X	75.15	55	0000000050023		
099		62.2595											152.91						298.85	K	50.00	R			
																			165.36	2	281.99	3			
04	02/11/2007	02/16/2007	62.2595	80.00				4980.76					4980.76		692.13	308.81	99.62	4.48	2779.24	X	75.15	55	0000000070027		
099		62.2595											152.91						298.85	K	50.00	R			
																			165.36	2	281.99	3			
05	02/25/2007	03/02/2007	62.2595	80.00				4980.76					4980.76		692.13	308.81	99.62	4.48	2779.23	X	75.15	55	0000000090030		
099		62.2595											152.91						298.85	K	50.00	R			
																			165.36	2	281.99	3			
06	03/11/2007	03/16/2007	62.2595							20000.00	B		20000.00		5649.67	1240.00	400.00						11785.33		
099		62.2595											614.00										net		
07	03/11/2007	03/16/2007	62.2595	75.00	5.00	L		4669.46		311.30	L		4980.76		692.13	308.80	99.62	4.49	2779.24	X	75.15	55	0000000110029		
099		62.2595											152.91						298.85	K	50.00	R			
																			165.36	2	281.99	3			
08	03/25/2007	03/30/2007	62.2595	77.00	3.00	L		4789.98		186.78	L		4980.76		692.13	308.81	99.62	4.48	2779.24	X	75.15	55	0000000130032		
099		62.2595											152.91						298.85	K	50.00	R			
																			165.36	2	281.99	3			

TOTALS		REG HOURS	O/T HOURS	HOURS	REG EARNINGS	O/T EARN	EARNINGS 1	EARNINGS 2	EARNINGS 3	GROSS PAY	FEDERAL TAX	STATE TAX	SOC. SEC. TAX	MEDICARE TAX	LOCAL TAX	SUI/SDI	NET PAY
QTR	528.00	0.00	32.00	0.00	32873.01	0.00	21992.31	0.00	0.00	54865.32	10494.58	1684.97	3401.65	795.55	1097.34	49.38	25554.12
YTD										54865.32	10494.58	1684.97	3401.65	795.55	1097.34	49.38	11788.33

HOURS/UNITS ANALYSIS		EARNINGS ANALYSIS			STATE ANALYSIS		LOCAL ANALYSIS		VOLUNTARY DEDUCTIONS ANALYSIS											
	32.00	L	20000.00	B	1992.31	L	1684.37	59PA	1097.34	110C	2091.95 1409.95	K 3	52.00 526.05	O 55	350.00	R	19966.65	X	1157.52	2



Employee Earnings Record

PRIMECARE MEDICAL

Company Code: DMV

Batch: 0524-052 Quarter Ended : 03/31/2007
SMITH, RICHARD C.

Page: 44

FILE		SSN	DATA CONTROL		SEX	CLOCK	EMPLOYEE NAME AND ADDRESS		STATE		SUI/SDI	LOCAL
		1022 XXX XX 9621			M		SMITH, RICHARD C.		PA		59	110C
Date	Date 2	Date 3										
03/30/1990	06/04/1954											

CAMP HILL, PA 17011

PAY DETAILS	Pay #	Date	Rate	HOURS/UNITS		EARNINGS		GROSS	STATUTORY DEDUCTIONS				VOLUNTARY DED.		NET PAY
				Reg	O/T	Hours 3 & 4	Earnings 3 & 4		Federal	State	Med	Local	Amount	CD	Check #
01	04/08/2007	04/13/2007	62.2595	76.00	4.00	L	249.04	L	4980.76	692.13	308.81	99.62	2779.24	X	75.15 55
099									152.91	72.22	4.48		298.85	K	50.00 R
													165.36	2	281.99 3
02	04/22/2007	04/27/2007	62.2595	68.00	12.00	L	747.11	L	4980.76	692.13	308.80	99.62	2779.25	X	75.15 55
099									152.91	72.22	4.48		298.85	K	50.00 R
													165.36	2	281.99 3
03	05/06/2007	05/11/2007	62.2595	80.00					4980.76	672.76	304.01	98.84	2730.21	X	75.15 55
099									150.53	71.10	4.49		77.47	H	298.85 K
													50.00	R	165.36 2
04	05/20/2007	05/25/2007	62.2595	26.00	56.00	L	3486.53	L	5105.28	702.02	311.72	101.33	2802.08	X	75.15 55
099									154.35	72.90	4.59		77.47	H	306.32 K
													50.00	R	165.36 2
05	06/03/2007	06/08/2007	62.2595	8.00	72.00	L	4482.68	L	4980.76	672.76	304.01	98.84	2730.22	X	75.15 55
099									150.53	71.10	4.48		77.47	H	298.85 K
													50.00	R	165.36 2
06	06/17/2007	06/22/2007	62.2595	80.00		L	4980.76	L	4980.76	672.76	304.00	98.84	2730.22	X	75.15 55
099									150.53	71.10	4.49		77.47	H	298.85 K
													50.00	R	165.36 2
07	06/22/2007	06/28/2007	62.2595				12789.36	B	12789.36	1278.95	792.94	127.89	281.99	3	10000.00
099									392.63	185.44	11.51				000050938009

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TOTALS	REG. HOURS		O/T HOURS		HOURS		REG. EARNINGS		O/T EARNINGS		EARNINGS		GROSS PAY		FEDERAL TAX		STATE TAX		MEDICARE TAX		SOC. SEC. TAX		LOCAL		TOTAL		VOL. DED.		NET PAY	
	258.00	0.00	224.00	0.00	0.00	0.00	16062.96	0.00	13946.12	0.00	12789.36	0.00	42798.44	5383.51	1304.39	616.08	2634.29	724.98	6035.94	1822.32	1411.63	87.90								
QTR																														
YTD																														

HOURS/UNITS ANALYSIS				EARNINGS ANALYSIS				STATE ANALYSIS				LOCAL ANALYSIS				VOLUNTARY DEDUCTIONS ANALYSIS																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														



Employee Earnings Record

PRIMECARE MEDICAL

Company Code: DMV

Batch: 0563-052 Quarter Ended : 06/30/2007

SMITH, RICHARD C.

Page:38

1000

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FILE SSN DATA CONTROL SEX CLOCK EMPLOYEE NAME AND ADDRESS STATE SU/SDI LOCAL
 1022 XXX XX 9621 M PA 59 110C

Date 1 03/30/1990 Date 2 06/04/1954 Date 3
 SMITH, RICHARD C.
 366 EQUUS DRIVE

CAMP HILL, PA 17011

PAY DETAILS		HOURS/UNITS		EARNINGS		GROSS		STATUTORY DEDUCTIONS		VOLUNTARY DED		NET PAY	
Pay F	P/E Date	Pay Date	Reg	O/T	Hours 3 & 4	Reg	O/T	Earnings 3 & 4	Earnings 5	Amount	CD	Amount	CD
07	03/23/2008	03/26/2008								281.99	3		
099													

62.2595

TOTALS		HOURS/UNITS ANALYSIS		EARNINGS ANALYSIS		STATE ANALYSIS		LOCAL ANALYSIS		VOLUNTARY DEDUCTIONS ANALYSIS		TOTAL VOL DED	
REG HOURS	O/T HOURS	HOURS 1	HOURS 2	REG EARNINGS 1	O/T EARN 2	EARNINGS 3	EARNINGS 4	EARNINGS 5	GROSS PAY	FEDERAL TAX	STATE TAX	LOCAL TAX	NET PAY
352.00	0.00	144.00	0.00	21915.35	0.00	8965.36	0.00	0.00	30880.71	3978.91	1880.98	612.19	22776.74
									30880.71	931.38	439.91	18.53	242.07
										3978.91	1880.98	612.19	
										931.38	439.91	18.53	

HOURS/UNITS ANALYSIS		EARNINGS ANALYSIS		STATE ANALYSIS		LOCAL ANALYSIS		VOLUNTARY DEDUCTIONS ANALYSIS									
144.00	L	8965.36	L	931.38	59PA	612.19	110C	542.29	H	1852.87	K	52.00	O	350.00	R	16328.89	X
								1157.52	2	1973.93	3	519.24	55				

ADP Employee Earnings Record

PRIMECARE MEDICAL
 Company Code: DMV

Batch: 0658-052 Quarter Ended : 03/31/2008 Page: 38
 SMITH, RICHARD C.

Permanent Psychiatric Schedule for PA / NH Facilities

Facility	Contract Hrs	On Site?	Provider	Hrs	Weekday	Time
Adams	2-4	Yes	Abbey	4	Tuesday	0800 -1200
Berks	8	Yes	Davis	8	Friday	0900 -1700
Berks	8	Yes	Martin	7	Monday	0730 -1430
Blair	Consulting	No	Venbrux	2	Thursday	1215 - 1415
Cambria	2-4	No	Venbrux	4	Wednesday	0800 - 1200
Centre	3-6	No	Davis	3	Monday	1330 -1630
Chester	8-10	Yes	Davis	10	Thursday	1000 - 2000
Cumberland	2-4	Yes	Borno	4	Friday	1300 -1700
Dauphin	10	Yes	Martin	4	Tuesday	0800 -1200
Dauphin	10	Yes	Martin	6	Wednesday	1000 - 1600
Franklin	4	Yes	Abbey	4	Tuesday	1230 - 1630
Franklin	4	No	Martin	2	Wednesday	0800 - 1000
Jefferson	1-3	No	Venbrux	2	Thursday	1415 -1615
Lehigh	6	Yes	Dedania	2	Monday	1500 - 1700
Lehigh	6	Yes	Thomas	2	Wednesday	1500 - 1700
Lehigh Juv	Consulting	Yes	Dedania / Thomas	Consulting	Consulting	Consulting
Monroe	2	Yes	Dedania / Thomas	2	Sat/Sun	1100 - 1300
Northampton	3-4	Yes	Dedania	4	Tuesday	1600 - 2000
Northampton	3-4	Yes	Thomas	4	Sat/Sun	1000 -1400
PACF (E)	1-2	No	Pandya	2	Thursday	1700 - 1900
Pike	5	No	Turnberg / Volpe	5	Wednesday	1000 - 1600
Rockingham	Consulting	No	Davis	1	Monday	1230 -1330
Schaffner	2-3	Yes	Martin	2	Wednesday	1600 - 1800
Schuylkill	2-4	No	Venbrux	4	Friday	0800 -1200
Somerset	3-4	Yes	Ryan	3-4	Monday	0800 - 1200
WPACF	12 (mo)	Yes	Romero	6 (per trip)	3rd Tues / 4th Fri	1000 - 1600
WPACF	6 (mo)	Yes	Pastorius	6 (per trip)	1st Fri	0830 - 1430
York	8	Yes	Borno	6	Wednesday	0800 -1600
York	8	Yes	Borno	8	Thursday	0800 -1500
York Juv	1-2	Yes	Borno	2	Wednesday	1200 - 1400

Reviewed Approved 5/14/07

5/14/07

5-7-07

5/14/07

Effective: 04/30/2007

EXHIBIT

2

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